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Newark ■ Philadelphia

April 23, 2020

VIA ECF

Hon. Edward S. Kiel, U.S.M.J.
United States District Court for the
District of New Jersey
U.S. Post Office and Courthouse Building
2 Federal Square, Courtroom 8
Newark, NJ 07102

Re: *Robinson, et al. v. Jackson Hewitt, Inc., et al.*
Civil Action No. 19-cv-9066(SDW)(ESK)

Dear Judge Kiel:

Together with our co-counsel, this office represents plaintiffs and the putative class in this matter. In coordination with counsel for defendants, this letter is submitted jointly to provide a list of items that the parties intend to raise as updates for court, as well as an area of discovery dispute for resolution in connection with the telephone status conference scheduled for April 28, 2020 at 10 AM. Those are: (1) an update regarding named plaintiff Nicole Gibson, and (2) a dispute as to categories of information required to be included in privilege logs pursuant to a protocol for electronically stored information. The parties have met and conferred extensively about the privilege log dispute, but have been unable to reach a resolution. The parties will set forth their respective positions on that issue in a separate joint letter.

There are other matters that may later require resort to the Court, including the parameters for the Rule 30(b)(6) deposition(s) of defendants and certain of plaintiffs' responses to defendants' requests for production. The parties are in the process of meeting and conferring about those issues, so they are not ripe for the April 28 conference. We note them, however, so the Court can be fully aware of where the overall discovery situation stands.

We look forward to speaking with the Court on April 28. The parties will provide dial-in information by e-mail, per ECF No. 93. Thank you very much for your consideration.

Respectfully,

/s/ Bruce D. Greenberg

Bruce D. Greenberg

bdg/abm

cc: All counsel (via ECF)